

admits to a bus, at least one memory coupled to the bus for storing data and programming instructions that comprise applications and an operating system, and a processing unit coupled to the bus and running the operating system and applications by executing programming instructions. The Examiner concedes that AAPA does not admit to the operating system providing I/O services through a distinct one of a plurality of program structures, each program structure comprising a first programming interface for receiving service requests for a set of I/O services of a first type, a first server coupled to receive service requests and to dispatch service requests to the I/O services, an activation model to define an operating environment in which a service request is to be serviced by the set of I/O services, and at least one specific instance of the set of I/O services that operate within the activation model. The Examiner contends, however, that Taylor teaches these elements, and that the combination of AAPA with Taylor therefore renders the claimed invention unpatentable. Applicants respectfully traverse the Examiner's contention that Claims 1-21 are unpatentable over AAPA and Taylor.

As conceded by the Examiner, AAPA does not admit to or suggest numerous claimed elements, such as an operating system providing I/O services through a distinct one of a plurality of program structures, for example. Taylor does not, however, teach or suggest the elements not taught by AAPA, as the Examiner contends. For example, Taylor does not teach "a first plurality of tailored distinct programming interfaces available to access a plurality of separate sets of I/O services" (emphasis added), as claimed in amended Claim 1. The system as illustrated in Figure 1 of Taylor, purports to describe multiple instances of applications (12a-12n), including multiple instances of application programming interfaces (APIs) (11a-11n). These

"multiple" instances of APIs are not "tailored distinct" programming interfaces, i.e. each API is simply a version/instance of the complete API.

In contrast, an element of amended Claim 1 is a plurality of tailored distinct programming interfaces. These "tailored distinct" programming interfaces or "family programming interfaces" (FPIs) are designed to meet the particular needs of that family, e.g. the file system family (Specification, Page 12, lines 17-22). As illustrated in Figure 4, each family (3 shown) has a tailored distinct FPI that handles the service requests generated by the respective family. The FPIs may interact with each other to satisfy a service request. There is no teaching or suggestion of this type of tailored distinct programming interface in Taylor and thus the combination of Taylor with AAPA does not render the claimed invention unpatentable.

Furthermore, Taylor also does not teach or suggest that "the plurality of tailored distinct programming interfaces are tailored to a type of I/O service provided by each set of I/O services," as claimed in amended Claim 2. As described above, Taylor does not teach a tailored distinct programming interface. As such, there is no teaching or suggestion in Taylor for a tailored distinct programming interface tailored to a type of I/O service provided by each set of I/O services. The remaining claims include the same or similar limitations that are not taught or suggested by AAPA or Taylor, either alone or in combination. AAPA and Taylor therefore do not render the claimed invention unpatentable and Applicants respectfully request the Examiner to withdraw the rejection to the claims under 35 U.S.C. §103.

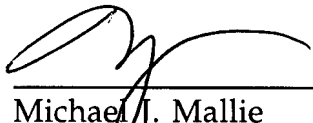
In conclusion, it is respectfully submitted that in view of the amendments and remarks set forth herein, that all objections and rejections

have been overcome. All claims are now in condition for allowance and such action is earnestly solicited.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Michael J. Mallie at (408) 720-8598.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 10/2, 1997

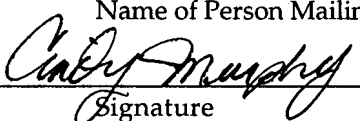


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